

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
v.	)	<b>Case No. 1:25-cr-00209</b>
	)	
<b>PETER ANDREW STINSON,</b>	)	
	)	
<b>Defendant.</b>	)	

**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE**

The defendant, Peter Andrew Stinson, by undersigned counsel, hereby respectfully requests that the Court grant a limited modification of the conditions of pretrial release originally ordered by this Court at the detention hearing on June 18, 2025. Specifically, Mr. Stinson requests that he be permitted to take both his parents to their dentist appointment on July 25, 2025. Mr. Stinson requested approval for this appointment for both his parents on July 8, 2025, and pretrial services granted his request to take his mother to this appointment but not his father. Undersigned counsel has conferred with counsel for the government, who does not object to this requested relief. Mr. Stinson states the following in support:

1. On June 13, 2025, Mr. Stinson was charged in a criminal complaint with making threats against the President, in violation of 18 U.S.C. § 871. *See* Dkt. Nos. 1-2. He was arrested on June 13, 2025 and had his initial appearance in this district on June 16, 2025, where undersigned counsel was appointed. *See* Dkt. Nos. 7-8, 13. On July 10, 2025, Mr. Stinson was indicted with two counts of making threats against the President, in violation of 18 U.S.C. § 871. *See* Dkt. No. 32. An arraignment is currently scheduled for July 18, 2025.

2. As is relevant to the instant motion, on June 18, 2025, the Court entered an Order Setting Conditions of Release (Dkt. No. 16), which requires that Mr. Stinson be subject to home detention with exceptions. On June 25, 2025, the defense filed a motion to modify conditions of release to permit Mr. Stinson to assist both of his elderly parents with their medical needs and to attend religious services led by his father. *See* Dkt. No. 22; *see also* Dkt. Nos. 23, 24, 25, and 27. The Court granted Mr. Stinson's request to take only his mother to specialist appointments and otherwise denied the remaining requests for relief. *See* Dkt. No. 31.

3. On July 8, 2025, Mr. Stinson requested approval from pretrial services to take both of his parents to back-to-back dentist appointments with the same dentist on July 25, 2025. He would transport his parents from their retirement community, remain with them at the dentist, and then return them to their residence. He estimated this entire trip would take about 2 hours and 45 minutes. That same date, pretrial services granted his request with respect to his mother but denied the request for his father. This means that Mr. Stinson's elderly father would have to find his own transportation to and from the dentist's office, where his wife has an appointment with the same provider at the same time.<sup>1</sup>

4. Mr. Stinson therefore requests that the Court grant this limited modification to permit him to transport both of his parents for this one appointment

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<sup>1</sup> As set forth in the defense's response to the Court Order (Dkt. No. 27), Mr. Stinson's parents reside at an independent living retirement community. Given that they are independent living, they do not receive additional services, such as transportation to medical appointments.

with the same provider on July 25, 2025. Undersigned counsel has conferred with counsel for the government, who does not object to this requested relief.

For these reasons, Mr. Stinson requests that the Court grant this limited modification to permit him to take his parents to a dentist appointment, where they have back-to-back appointments and are seeing the same dentist. Undersigned counsel has attached a Proposed Order for the Court's consideration.

Date: July 14, 2025

Respectfully submitted,

**PETER ANDREW STINSON**

By Counsel,

\_\_\_\_\_/s/\_\_\_\_\_  
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